

Egremont Town Council Hearing Statement – Copeland Local Plan Hearings – December 2022

Please find below Egremont Town Council's response to the Draft Copeland Local Plan.

Matter 3-The Development Strategy Issue: Whether the development strategy is justified, effective and consistent with national policy

3.5 Does Policy DS3PU provide an appropriate Framework to guide development in the Principal Town, Key Service Centres, Local Service Centres, Sustainable Rural Villages and Rural Villages?

Egremont provides services for the surrounding villages of Moor Row, Bigrigg, Thornhill, Woodend, Haile, Wilton & Beckermest. A key example is Westlakes Academy which is a very popular and oversubscribed secondary school. It should be noted that the school has pupils from Cleator Moor and Whitehaven too. This means that Egremont and the villages in the catchment area are popular with would be home owners. We would question the hierarchy provided to Moor Row and Bigrigg when both are in close proximity to no just Egremont but Cleator Moor and Whitehaven). Moor Row is a very popular village and has seen significant growth in housing over the last ten years.

The Town Council would welcome a hierarchy that encourages investment in Egremont, Moor Row and Bigrigg.

Wilton and Haile could be considered as other Rural Villages to supported very limited growth. Both villages are very attractive to homeowners and are well connected to Egremont and Sellafield. There may be limited services in the villages but they are a short drive to Egremont town centre and we find that most residents in Egremont themselves often drive into the town centre too so, from a sustainability perspective it does not make much a difference if people live on the edge of the town or the surrounding villages.

A sensible hierarchy would show that Copeland is open for business and encourage investment in Egremont town centre.

3.6 Is it clear the scale of development which will be allowed within each tier of the hierarchy? Does the level of growth proposed in each area reflect the housing and employment needs in the different parts of the Borough?

Egremont Town Council has seen demand for housing across Egremont, Moor Row and Bigrigg and the level of growth proposed is not adequate to meet the future housing need in the Council's opinion.

3.8 What is the basis of the proposed settlement clusters?

Egremont Town Council would like to understand what constitutes a cluster. As an example people walk and cycle to Egremont town centre from Woodend, Bigrigg and Thornhill; are these not clusters? Or is Bigrigg and Woodend not a cluster?

3.10 Are the proposed settlement boundaries justified on the basis of proportionate evidence?

Para 5.5.7 of the draft local plan states:-

"Boundaries are based on land ownership and/or clearly delineated curtilage edges or landscape features (both natural and unnatural) such as hedgerows or roads in most cases."

However we have previously noted that the proposed boundary cuts through people's gardens on Brisco Road for example. Furthermore it cuts out a small grazing field near Christie Bridge/East Road close to the cycle track. It includes a large triangular field to the north of the town between the A5098 and cycle track which seems out of odds with the rest of the settlement. Consideration should also be given to including the Egremont Ranger and cricket pitch and facilities to the north of the proposed settlement boundary.

Bigrigg's settlement boundary has been proposed to be extended to the north which we support to facilitate investment. However the proposed settlement boundary extension to the west cuts through an existing field and leaves a housing allocation that will be too small to be attractive to would be developers. The land will require a foul pump, SUDs area and space to provide 10% increase of biodiversity net gain but this will be difficult to achieve in the proposed settlement boundary extension/housing allocation.

Moor Row has seen a lot of housing come forward recently and has extant planning permission still to come forward but there could be opportunities to provide space for growth in the west of the village that could release financial contributions to improve highway safety and much needed infrastructure improvements.

3.11 Will the settlement boundaries defined on the draft Proposals Map be effective in enabling further windfall sites to come forward to meet any residual housing need?

Egremont Town Council asserts that they will not. There is only 2 landowners who have land proposed to be included in the settlement boundary of Egremont that will be suitable for major residential development. The remaining land that is not allocated but could be suitable for residential development is often small brownfield sites that will struggle to be viable due to cost of building homes in West Cumbria, a lack of local SME housebuilders and future viability issues with housebuilding in general.

3.12 Does Strategic Policy DS4PU provide an appropriate basis to manage development within and adjacent to settlement boundaries and beyond in the open countryside?

As set out previously in our consultation response the Town Council believes that the proposed policy is too restrictive to enable sensible and sustainable development to come forward outside the settlement boundary.

Sites would only be considered suitable if:-

- Sites directly adjoin the settlement boundary
- Have a safe existing pedestrian link
- The Council do not have a 5 year land supply or have undelivered for a 3 year period.

Considering each of the criteria; first a site should not be discarded because it doesn't directly adjoin the settlement boundary. A site should be taken on its merits and if the settlement pattern has clusters of houses on the edge of town then there is no need for site to directly adjoin the settlement – particularly if there is no negative impact on the local land landscape. The site would still have to be well related to the settlement just not physically adjoining.

Secondly; a site should not need an existing pedestrian link. A suitable windfall site could be acceptable because it will deliver a safe pedestrian link through either a s278 or s106 agreement with the Council.

Thirdly a windfall development should not need to demonstrate a lack of land supply or delivery. So long as no harm can be established such as it will seriously undermine the delivery of the local plan or have a negative impact on the local landscape that outweighs the benefit of housing then windfall development should be supported outside a settlement boundary.

It should be noted that windfall sites often provide much needed affordable housing and infrastructure improvements as the applicants know they need to provide that overall justification for the site to come forward. This would be a positive for Egremont and the Town Council would support sites that provided much needed investment into the town.

Matter 7 – Retail and other main town centre uses Issue - Whether the Local Plan has been positively prepared and whether the approach to retail and other main town centre uses is justified, effective and consistent with national policy

7.3 How does the Local Plan seek to accommodate any needs for such development?

7.5 Does Policy SP R1PU provide an appropriate strategic framework for the vitality and viability of town centres and villages?

7.6 What is the basis for the hierarchy of town centres set out in Policy SP R2PU? Does it provide an effective framework to guide new development to the most appropriate locations consistent with the development strategy? Whitehaven Town Centre (Policies SP R3PU; R6PU)

7.7 Does Policy SP R3PU provide an effective framework for Whitehaven Town Centre? How were the town centre boundary and the Primary Shopping Area (PSA) defined? Is the policy justified, effective and consistent with national policy?

7.8 Is the approach set out in Policy R6PU regarding Whitehaven Primary Shopping Area justified, effective and consistent with national policy? Would the Policy provide effective guidance in relation to the proportion of non-retail uses in the PSA? Key Service Centres (Policy SP R4PU)

7.9 Does Policy SP R4PU provide an effective framework for the key service centres of Cleator Moor, Egremont and Millom? How were the town centre boundaries defined? Is the policy justified, effective and consistent with national policy? Rural Areas (Policy R5PU)

7.10 Does Policy R5PU provide an effective framework for rural areas? Is the policy justified, effective and consistent with national policy? Copeland Local Plan 2021-2038 -Main Matters, Issues and Questions Page 10 Information Classification – UNCLASSIFIED Sequential test and Retail and Leisure Impact Assessments (Policies R7PU and R8PU)

7.11 Is the approach set out in Policy R7PU justified, effective and consistent with national policy?

7.12 What is the basis for the thresholds set out in Policy R8PU for an impact assessment and are these justified? Is the approach set out in Policy R8PU justified, effective and consistent with national policy?

Egremont Town Council asserts that Policy R8PU is not justified and we believe would restrict possible redevelopment opportunities on edge of town sites in Egremont such as the Former East Road Garage, Egremont. A Retail and Leisure Impact Assessment adds more cost and doubt to potential investment into our town when considering redeveloping sites such as the East Road Garage if the floor space is more than 350m². Considering the NPPF sets the threshold at 2500m². The Local Plan proposes a threshold of 500m² for most of Copeland but 300m² for Egremont and other Key Service Centre. As set out previously why would the Council want to complicate the possible redevelopment of a site like East Road Garage when its redevelopment could actually improve the functioning of the town centre too? All this policy will do is put off investors looking at possible sites across Copeland but particularly Egremont.

The Town Council asserts the policy should be consistent with the NPPF.

Matter 15 Housing Allocations

Issue – Whether the proposed housing allocations and broad locations are justified, effective and consistent with national policy?

Egremont Town Council has no objections to the proposed housing allocations but suggests that additional sites are considered or the settlement boundaries extended or the policy on settlement boundaries is relaxed to allow suitable windfall development to come forward too. Otherwise housing delivery is going to be controlled by two landowners and therefore Egremont could miss out on possible investment opportunities and improvements to its local infrastructure.

The allocations appear to lack appropriate viability assessments and it is not clear to would be developers what s106/CIL contributions would be expected.

Have the allocations factored in:-

- Cost of affordable homes delivery (in accordance with update NPPF and First Homes)
- The need to deliver 10% biodiversity net gain by November 2023
- The need to deliver Part L and Part S building regs
- The need for any site in Egremont (and Bigrigg and Moor Row) to provide contributions towards secondary school places due to West Lakes Academy being oversubscribed.

The Town Council raises the above queries as it could lead to a lack of delivery of investment in Egremont and developers will choose to deliver homes in areas with less viability problems. The Town Council wants to ensure the town is thriving but this will not happen if investment goes elsewhere.

Matter 16-Employment Site Allocations Issue – Whether the proposed employment allocations and opportunity sites are justified, effective and consistent with national policy?

Egremont Town Council supports the inclusion of:-

- OEG01 Chapel Street, Egremont
- OEG02 Former Red Lion PH, Main Street, Egremont
- OEG03 East Road Garage, Egremont

As opportunity sites and would like to see all sites come forward and be redeveloped in the near future.

Strict deadline for the submission of Hearing Statements to the Programme Officer, please submit 1 electronic copy by email and 2 hardcopies delivered to the Council Offices. Please respond to each Matter separately, and clearly label your statement to show each Matter and questions you have responded to. Late submissions will not be accepted. If you are hand delivering your statements, the Council offices will be closed in the afternoon of Friday 23rd December, but there is a letter box at the offices and your documents may be posted there.